Exhibit P

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - MIDDLESEX COUNTY
DOCKET NO. MID-L-003809-18AS

KAYME A. CLARK and
DUSTIN W. CLARK,

Plaintiffs,

v.

JOHNSON & JOHNSON, et al.,

Defendants.

VIRTUAL
DEPOSITION UPON
ORAL EXAMINATION
OF
WILLIAM E. LONGO
Ph.D.
(VOLUME II)

TRANSCRIPT of the stenographic notes of ANDREA F. NOCKS, a Certified Court Reporter and Certified Realtime Court Reporter of the State of New Jersey, Certificate No. XI01573, taken virtually on April 2, 2024, commencing at 11:18 a.m., Eastern Standard Time.

Job No. 6625014

Q. Okay. What about lizardite? How does the birefringence of lizardite compare to chrysotile and PLM?

A. Again, it was different.

Q. But you can't say whether it was --

A. I haven't looked at it in years. The main focus of the criticism is that nobody's ever said lizardite, nobody's ever said, antigorite. Are the experts changing their mind now? Everybody has said it's been -- what we have focused on is fibrous talc or talc plates on edge, if you talk to Mickey Gunter, who says there's no fibrous talc.

So, you know, initially when we were looking at this, we did look at them, but it's been years since I pulled them out.

Q. Okay. All right. Good time for a quick break. Want to take five --

A. Okay.

Q. -- minutes? It's 12:15. Let's try and get back on 12:20, if we can.

(Recess: 12:15 p.m. to 12:31 p.m., Eastern Standard Time.)

BY MR. HYNES:

Q. So, we'll continue talking about some of your prior Johnson & Johnson chrysotile reports.

I'll mark a group of them now. We can sort of get through it. So, we marked the 11A, so I'll mark next another sort of group of Chinese-sourced container reports from 2021.

This is a March 23rd, 2021, report on nine Chinese-sourced containers with varying M numbers, all in the 60,000 range.

Then, I'll mark some of the newer reports from 2023 forward. I guess I'll mark this one as 12A, Project M71614, the Valadez container from February 28, 2023.

As 12B, I'll mark M71643 from October 19th, 2023. This is the Dean Omar report.

Then I'll mark as Exhibit 12C, Project M71730. This is the Henderson report from November 28, 2023.

As Exhibit 12D I'll mark the February 15, 2024, report on Project M71740 in the Kirch, K-i-r-c-h, case.

Then I'll mark as a series of exhibits under 13 some of the Vermont-sourced PLM analyses. So, first I'll mark the February 24, 2020, report on M70484, the Zimmerman report.

Then I'll mark the April 6, 2020, M71046 Colley, C-o-l-l-e-y, report.

And then I will mark as Exhibit 13C the March 11, 2022, Project M71262 Klayman, K-l-a-y-m-a-n, report.

So, let's get into these. We'll start with the report that we were just looking at, Exhibit 11A, the 71211 report, and just get through some of the processes that you used in that report. And we'll go through, you know, some of the changes that were made over time.

But, if you're with me on that 11A report, if we look at page 6 of 17, there we have your walk-through of the CSM ISO PLM method, and I just wanted to confirm some things here.

Are you with me on page 6 of 17 there?

A. I am.

Q. Okay. And so for this analysis, an early -- I guess the analyses were performed late 2020/early 2021 in this M71211 report. But as part of the prep method here for the CSM method, your lab used, it looks like, heavy liquid density liquid of 2.72 grams per cc, right?

A. Yes.

Q. Okay. And then the centrifugation time for this one was 500 RPM for 10 minutes at room

temperature, and then another round of 1800 RPM for 10 minutes also at room temperature, right?

A. Correct.

Q. And then the analyses that we looked at, this was 1.550 refractive index oil, right?

A. Correct.

Q. And I think as part of this one, your lab analyzed both the light fraction, and then there were at least two analyses of the heavy --

(Court Reporter clarification.)

BY MR. HYNES:

Q. -- heavy pellets as part of this, right?

So, in the report itself, you document, I believe, the sort of the analysis of this via PLM with no liquid density separation technique, then you document the analysis of the light fraction using the CSM technique, right?

A. Let me get to ISO --

Q. Right.

If you get to, like, page 45, which I think is the first count sheet for one of the CSM preps, that's -- CSM which would reflect light fraction, right?

A. Separation. We got without, now we

have with.

Yes, you're right. Just light fraction.

Q. Right.

And then if we flip to Exhibit 11 that we marked the last time around, this is that same project number, M71211, and there were also some analyses, at least, of the CSMP, which is the pellet, right?

A. 71211-7?

Q. I think if you look at the date of what's on my screen versus what you've got in your hands, these pellet analyses, I think, happened after your report was generated. Your report was January 2021, and then these pellet count sheets are May of that same year, so a little bit later in time.

A. Three -- yeah, you're right, it was done later.

Q. Right. And so in the report you've got, the January report that we marked as Exhibit 11A, the CSM analyses that are reflected in the summation in that report and then the count sheets behind it, that's the analysis of the light fraction, right?

A. That is correct.

Q. And then at some point later there were at least two analyses of the heavy fraction of the pellet from two different samples from that M71211 report, and those happened in -- the two that we're aware of happened in May of 2021, right?

A. Correct.

Q. Okay. And then we looked at the report results, but your laboratory reported results in both a percent area for chrysotile as well as the structure per gram for chrysotile as part of that report, right?

A. Correct.

Q. Okay. And if we go to what I marked as Exhibit 11B, it's that March 23rd, 2021, report -- I'll share my screen here in case you don't have a copy handy.

Do you recognize this report, Dr. Longo, of March 23, 2021 report on nine off-the-shelf samples?

A. I mean, I recognize that's our report. Do I remember doing that? No.

Q. Okay. That's fine. We can just read along.

So, if we go to the method section of

that report which is on page 5, it looks like it's essentially the same process that was used in that January 25th report, 2.72 liquid density liquid used, right?

A. Yes.

Q. The same centrifugation process, it was the 500 RPM for 10 minutes room temperature, and then another round of 1800 RPM for 10 minutes, also room temperature, right?

A. Correct.

Q. If you go to, I'll say here, the light fraction was analyzed as part of this report, right?

A. That's what it states.

Q. Okay. And then it was analyzed by 1.550 refractive index oil, right?

A. Yes, sir.

Q. And then results were reported out in both the percent weight as well as the structure per gram for chrysotile, right?

A. Yeah. Hold on. I want to just write the M numbers down. Those are all different.

Q. I believe these are --

A. Can we go to the very front cover letter so I can just get exact -- not that. The

very front page will have something on there to help me dig this up.

Let me get down to the date, March 23rd. All right.

Q. I think it's all the Chinese-sourced containers that were in your August 2017 eBay report, if you recall that.

Okay. And so, we're just looking at the results, but you reported out results in both structures per gram and percent weight for chrysotile in this report, right?

A. Yes.

Q. And the formula for the -- for calculating the chrysotile structures per gram is the same formula that we were looking at in the M71211 report, same total area, same area in the 30 total fields of view that we were looking at the last round, right?

A. Yes.

Q. Okay. And if we flip to the, you know, the first PLM image, it looks like it's the same microscope that you guys were using in that last M71211 report, right?

A. Correct.

Q. All right. Then if we jump back in

time to Zimmerman, this is the February 24, 2020, report on M70484. If we jump ahead to the method here, you're again using a 2.72 liquid density liquid for the separation here, right?

A. Correct.

Q. I think you're also doing the 500 RPM for 10 minutes room temperature, and then another round of 1800 RPM for 10 minutes at room temperature centrifugation, right?

A. Correct.

Q. And in these first wave of, you know, PLM analyses from 2020, your lab was just analyzing the light fraction by PLM, right?

Sorry. Did you answer?

A. No. I'm just trying to read it.

I believe so.

Q. So the light fraction was analyzed, right?

A. I believe so.

Q. And analyzed in 1.550 index oil?

A. Correct.

Q. And at this point in time your lab was not yet reporting results in terms of structures per gram, right? It was just limited to percent by weight, right?

A. Correct.
Q. And then one thing your lab mentioned -- or you mentioned back in this report in February 2020, that you were still working on the heavy liquid density for chrysotile asbestos and by TEM.
And it's still true that your lab has not analyzed the Johnson & Johnson Baby Powder sample and reported results of chrysotile by TEM using that method to date, right?
A. Correct.
Q. Okay. Then we go to Colley, which I've marked. It's an April 6, 2020, report. M71046 is another --
A. I'm sorry. M71046?
Q. Right.
A. '46. What is that, 20- -- 2020?
Q. Yes, sir.
A. Okay. Thank you.
Q. You're welcome.
And I guess I should mention just briefly, if we go back to the Zimmerman report that was on a container, one of the containers in that report was dated from 1994, right?
A. Correct.

Q. And --
A. M70484-001 and M70484-002.
Q. And if a container is from 1994 and it's the same talc that was originally in that container, it most likely would have been sourced from Vermont if it was a US market product, right?
A. 1994. Yes, that would be Vermont.
Q. Okay. Then, so we switch to Colley, Exhibit 13B, that sample dates to 1996. It would also be a Vermont source sample, right?
A. Yes.
Q. And if we go to the method here, there's a different density liquid used for this analysis than the other analyses we looked at before, right? This one has a 2.70 versus a 2.72 liquid density used here, right?
A. Yeah. I thought I caught all those. Those were typos. We've always used 2.72, as I recall.
Q. Okay. So this is a typo. It would have also been 2.72?
A. Yes. I think that's all we ever used. I think we tried 2.70, you know, before we figured out why the pellet.
Q. The centrifugation process is the

same here, another 500 RPM for 10 minutes room temperature, and then 1800 for 10 minutes also at room temperature, right?

A. Yes.

Q. And then you also analyzed just the light fraction as part of this analysis in the Colley report, right?

A. Yes.

Q. And analyzed it by 1.550 refractive index oil, right?

A. Correct.

Q. And similar to that last report we looked at, there's no fiber per gram for chrysotile reported here; it's just reported in chrysotile percent weight, right?

A. Correct.

Q. Okay. Then we jump to the next one here, 13C. This is the March 11, 2022, report, Project M71262 on Klayman's baby powder and Shower to Shower containers.

Jump ahead, there are several containers in here, one from 1996 and one from 2000, that would have been sourced from Vermont-sourced talc, right?

A. Correct. Hold on a sec. Let me just

get the M number.

Okay.

Q. If we go down to the method for chrysotile here, you're again using 2.72 refractive index or heavy liquid oil for the separate technique here, right?

A. Correct.

Q. Same 500 RPM for 10 minutes at room temperature, and then 1800 for 10 minutes at room temperature centrifugation for this report, right?

A. Correct.

Q. But here, instead of analyzing the light fraction, your laboratory analyzed the heavy mineral pellet for purposes of this analysis, right?

A. Correct.

Q. Okay. You did not analyze the light fraction for the Klayman report in March of 2022, right?

A. I mean, unless it is in there somewhere, the answer would be no.

Q. Okay. And then this analysis was performed using 1.550 refractive index oil, right?

A. Yes.

Q. And then this analysis reported results in both -- in both percent weight as well as

structures per gram, right? This table that I'm showing you doesn't actually have the structures per gram, but if you recall, I can show you where the structures per gram is.

A. There it is.

Q. This was both percent weight and structure per gram in this report, right?

A. Correct.

Q. Okay. And then the formula for structures per gram is the same formula that we looked at in the report that we marked as 11A and 11B, right?

It's that same 972 millimeter squared total area and 90.6 millimeter squared area for the 30 total fields of view on the three mounts, right?

A. Yes.

Q. Okay. And then if we flip to one of the images here, we go to the first PLM image which appears on page 36 of this report. So, was this photograph taken using the old microscopes that were part of the analyses from, like, the M71211 report, or was this taken using the new Leica microscopes?

A. The new Leica microscopes.

Q. Okay. And so I didn't ask you about this yet. So this image is a little bit -- I guess

it's a little bit different from, like, what we were looking at on page 25 of Exhibit 11A.

So here -- you mentioned before that on the new microscope there's a scale bar at the bottom of the report, right, as opposed to just a scale underneath a particle that's under analysis, right?

A. Yeah. I can't quite read it, but that's where the scale bars are.

Q. Right.

And so there's -- on this particular image, page 36 of Exhibit 13C, there's a 100 micron scale bar at the very bottom of the --

A. That should be 25.

Q. That should be 25?

A. This was when the scope was brand new. Those were supposed to be fixed, but that's not 100.

Q. Okay. So, that should be 25?

A. Yes. I think they all show 100. That's screwed up.

Q. Okay. So, when the scope was brand new, I guess are there some reports where the scale bar is just incorrect on the images?

A. Yes.

Q. Okay. And how -- how would you be able to tell that the scale bar's incorrect on the images?

A. Because that is the 10x right there. It's 100.

Q. Yeah.

A. And if you were to lay that fiber down there, it's going to show about 30 or -- 30 microns or so, and it's not. So -- let me just grab one here.

Anyway -- oh, here's one. If you go to the M71614 report and go to dispersion staining, exact same magnification, same everything, go to M71614-001, you can see the micron bar is 25 for that exact same, and that's correct. That's been calibrated. The analyst didn't realize that it was not calibrated at the time on a few projects.

Q. Okay. And so --

A. Go ahead.

Q. Yeah, so I'm clear, so we just looked at Exhibit 12A, which is the Valadez report M71614. We flipped to page 32 of that report. There's a PLM image there with a 25 micron bar at the bottom of the page there. And if we compare that to page 36 of Exhibit 13C, that March 11, 2022, Klayman report,

I guess, Dr. Longo, it's your testimony that the 100 micron scale bar at the bottom of this image should read 25 microns. Is that right?

A. It's 100 microns. And that's way too small for 100 microns. It should be the 25 microns at this magnification for this microscope.

Q. Okay. And so, you said that there were some projects for which there are scale bars like this one taken using the new Leica microscope that are inaccurate.

Has your laboratory gone back and revised those reports to include updated, corrected scale bars?

A. There were a of couple projects. I thought we got them all. It may have been before we sent them out. Obviously, I missed this one, so I'm going to have to deal with it.

Q. Okay. And then for -- I guess walk me through, when did your laboratory realize that some of the M projects using the new microscope had an incorrect scale bar associated with some of the PLM photomicrographs?

A. I couldn't tell you when, but I remember catching it at some point and going back because all of a sudden they changed, and going back

to talk to -- I forget which analyst it was. And I thought we got them all, but I couldn't give you a date.

Q. And then what was the, sort of, next step? Did your laboratory then go through a calibration process to reset the scaling for the new Leica microscopes in your lab? What happened next?

A. Well, it was on a default of 100 microns. It had to be -- the computer program had to be recalibrated by putting in the size. I forget exactly how it did it, but -- so, it gave -- then it gave the proper -- but I don't remember exactly how the computer system works on that aspect of it.

Q. And I guess catching the scale issue, that must have happened at some point after March of 2022 when this Klayman report was issued, right?

A. Whenever this analysis was done on this project.

Q. Right. So I guess --

A. You have to look at the analysis. A lot of times -- the report going out the door doesn't necessarily mean that's when the analysis was done. See, this was done in April of 2021.

Q. Okay. So, I guess, all we know sitting here today is at some point between April of

2021 when the Klayman analyses performed, and then February of 2023 when the Valadez analyses were performed, there is a calibration process to fix the scale bar that was used in the Klayman report for subsequent analyses performed using a new Leica microscope, right?

A. Well, it's right that it was long before the Valadez one, because if we go to the -- this is the old scope. Never mind.

Anyway, I don't know exactly when, but it was long before the Valadez.

Q. I guess while we're here, let's talk a little bit about the Valadez report.

So, on this one, I just wanted to talk through the method here.

So, here is -- I guess at some point after the Klayman analyses in 2021 and when we get to the Valadez analyses in 2023, your lab starts using a 2.65 liquid density heavy liquid for purposes of chrysotile separation technique, right?

A. Incorrect.

Q. Okay. Tell me what's incorrect.

A. Yes.

Q. I am correct?

A. Correct. We started using 2.65.

Q. Okay. So, this Valadez report from February 2023, there's a 2.65 liquid used, and then there's a different, sort of centrifugation technique, used.

I guess, first, before the centrifugation process starts, there's a vigorous shaking for 10 to 20 seconds by the person doing the analysis. That's new, right?

A. I don't think so. I thought we had been doing that for a while.

Q. Okay. If I see -- right. If we go to, like, Exhibit 11A, the January 25, 2021, report, there's no discussion of vigorous shaking as part of the preparation process there, right?

A. Yeah. I have to go back and check because I thought that was something we routinely did for a while, but it doesn't really matter.

Q. Okay. And then next, the centrifugation process here is different from what we were looking at in those other reports, right? This one is placed at 2,000 RPM for 92 hours at room temperature, right?

A. Correct.

Q. Okay. So it goes from a 20-minute process to now multiple days, right?

A. Correct.
Q. And then for purposes of this analysis, in February 2023, your lab analyzed the light fraction, right?
A. Yes.
Q. Okay. And you analyzed it in 1.560 refractive index oil, right?
A. Correct.
Q. And then you reported results in both percent weight as well as structures per gram here, right, if you look on page 9 of this report?
A. Yes.
Q. Okay. And then for Exhibit 12B, this is the M71643 report from October 19, 2023, go through the process here.
So, here in this report you're also using a 2.65 liquid, right?
A. A 2.65, yes.
Q. And then there's this vigorous shaking performed for 10 to 20 seconds, right?
A. Correct.
Q. Then another slightly different centrifugation process here. It's 2,000 RPMs for 72 hours at 15 degrees Celsius, right?
A. Correct.

Q. So, it's a different amount of time than that last report we looked at. You go from 92 hours to 72 hours, right?

A. Yeah, I think that 92's a typo. It's always been 72, and we upped the time.

Q. And then this 15 degrees Celsius, why the change from room temperature to 15 degrees Celsius?

A. Because the -- we determined that the centrifugation at the time was heating up, spinning it that long. So, to heat up the liquid density -- the heavy density liquid, it's going to change the viscosity -- I mean, it's going to change the density because it's changing the viscosity. So, we put it at 15 degrees. We have it -- now it's back at room temperature, but it's at room temperature with the air-conditioning system on, so it doesn't ever go above room temperature. Keeps it right there.

Q. And then I guess I didn't ask, why did your laboratory go from a 20-minute centrifugation process to now a multiple-day centrifugation process?

A. Because we took the SG-210 and put in a fair amount so that we could see it into the heavy

liquid density; we spun it for what we were spinning it before, and it didn't really separate. So we moved it up 72 hours. It doesn't separate on 72 hours. Something's going on. Took it out at 72 hours, and all the Calidria was at the light fraction. That's why we went to 72 hours.

Now, it may be 48, 24, I don't know, but we sort of did. If it doesn't separate on 72 hours, that's a problem. That's why we're doing it now. But hopefully, we'll get that down to where we run four samples, you know, with the Calidria, 72, 48, 24, you know, maybe six hours or something, so that -- 'cause 72 hours is a burden to get a sample done.

Q. Tell me more about that SG-210 centrifugation experiment. Is that SG-210 on its own in this 2.65 liquid density liquid or is it SG-210 spiked into another medium and then placed into the --

A. No, it was just in the heavy liquid density material --

Q. Okay.

A. -- to see if it would all move to the light fraction, and it did. 'Cause you could see it, you know. It didn't have the talc in there.

Q. And did you do anything to the SG-210 material prior to adding it to the heavy liquid density liquid such as, you know, grinding, milling, mortar and pestle, anything to it, prior to adding it to this heavy liquid?

A. No. No, no, and no. There would be no reason to do any of that. It's at the -- the SG-210 has the same length and width that we're seeing in the cosmetic talc.

Q. Does your laboratory have any written documentation regarding this SG-210 centrifugation experiment?

A. No, it was just a simple -- usually the simplest answers are right.

Q. Okay. And then if we continue along with this Exhibit 12B, again, here you just analyzed the light fraction as part of this October 19, 2023, report, right?

A. Correct.

Q. And that was analyzed by 1.560 refractive index oil, right?

A. Correct.

Q. And you reported results in both -- both the percent weight and structures per gram for chrysotile, right?

A. Correct.

Q. If we go to 12C, this is the November 28, 2023, Henderson report. If we go to the CSM sample preparation process there, this is the same process we just looked at for the October Dean Omar report. This is 2.65 heavy liquid, right?

A. Correct.

Q. Same 10 to 20 vigorous shaking followed by 2,000 RPM for 72 hours at 15 degrees Celsius, right?

A. Correct.

Q. Then you analyze just the light fraction, right?

A. Correct.

Q. And you analyze it at 1.560 refractive index oil, right?

A. Correct.

Q. And the reporting for this one is in both percent weight for chrysotile and structures per gram for chrysotile, right?

A. Correct.

Q. And then the most recent report is this February 15, 2024, M project 71740. If we jump to the prep on page 4 there, it looks like it's the same that we just went through except for this one

change you just mentioned, where it's back to 21 degrees Celsius room temperature for the centrifugation process as opposed to the 15 degree Celsius, right?

A. Correct. With the air-conditioning -- it has a cooling system set to keep it at 21, because the long spinning time, it gets warm.

Q. Okay. But aside from that, 2.65 heavy liquid, right?

A. Yes.

Q. Same 10 to 20 seconds vigorous shaking, 2,000 RPM for 72 hours, right?

A. Correct.

Q. Light fraction only analyzed?

A. Correct.

Q. And that 1.560 index oil used for the analysis, right?

A. Correct.

Q. And then reporting is in terms of percent by weight and structures per gram, right?

A. Correct.

Q. And then on the structure per gram reports, so if we go to 11B, it jumped to basically the first count sheet there on page 52 of Exhibit

11B. There's a MAS PLM analysis worksheet there, but behind it is just the photomicrographs associated with that analysis.

There are not, Dr. Longo, these chrysotile in talc by PLM-count sheet worksheets attached to Exhibit 11B, right?

It's just the standard MAS, LLC, PLM analysis worksheet for each one of the CSM analyses performed in that report, right?

A. I guess so.

Q. And then same question for -- I guess we'll go in chron order -- the Klayman report, Exhibit 13C. We go to just page 31 -- actually, let's go to CSM. If we go to page 57 of what's been marked as Exhibit 13C, the March 11, 2022, report, we have just the standard MAS PLM analysis worksheet there. Behind it are the photomicrographs associated with that first analysis on M71262-001 CSM.

Like what we just looked at, there aren't these chrysotile in talc by PLM-count sheet documents attached to the report that we marked as Exhibit 13C, right?

A. That's correct.

Q. And then same question for the

Valadez report. If we jump, in Exhibit 12A, that first analysis there on page 31, we again have just the MAS standard PLM analysis worksheet, and then right behind it are the photomicrographs.

There are none of these chrysotile in talc by PLM-count sheets attached to what we marked as Exhibit 12A, correct?

A. Correct.

Q. Same question on 12B, the October 2023 Dean Omar report. If we jump ahead to page 30 of that report, we have the first PLM-count sheet, the Materials Analytical Services PLM analysis sheet. Immediately behind it are the photomicrographs associated with that part of the analysis.

What we don't have in this report are any of these chrysotile in talc by PLM-count sheet documents, right?

A. That's correct.

Q. Okay. Same question on 12C. This is the Henderson report from November of 2023. If we jump ahead to page 30 of that report, we've got the PLM analysis sheet here followed by the photomicrographs associated with that analysis.

We don't have these chrysotile in

talc by PLM-count sheet documents attached to the report that's been marked as 12C, right?

A. That's correct.

Q. Okay. And then similarly, the February 2024 report on M71740. If we jump ahead to page 31 of that report, we have another one of these MAS PLM analysis count sheets followed by the photomicrographs.

What we don't have associated with that report are these chrysotile in talc by PLM-count sheets, right?

A. That is correct.

Q. And I have another question on 13C. So, for purposes of the fiber per gram calculations that were used in the Klayman report from March 11, 2022, it's the same formula here that was used in the earlier reports we had looked at from 2021, right? Using the 90.6 millimeter squared area for 30 total fields of view on three mounts on the two glass slides, right?

A. Yes.

Q. Okay. But here your lab was using the newer Leica microscope, right? We had looked at that, you know, image on page 36.

This is from the newer Leica

microscope as opposed to the older microscope that was used as part of the 2021 reports, right?

A. Yes.

Q. And you had stated earlier that the newer microscope, the formula changed for calculating the structure per gram using the newer microscope versus the older microscope, right? There's a different area for the A-2 value in the new microscope, right?

A. Correct.

Q. Okay. And so -- and that new figure for the new microscope is 183.55 millimeter squared, right?

A. Correct.

Q. And so, were these structure per gram calculations performed using the 90.6 millimeter squared associated with the old microscope or was it performed with the new 23.55 millimeter squared from the new microscope?

A. It would be the new microscope -- well, what it is, is that the old spreadsheet was used, the calculation, and not the new. So that was wrong. And we just -- we didn't get around to fixing it. It would have made -- going to the same count for the smaller area size, the amount of

chrysotile bundles in there would have been much higher, but we didn't ever get around to fixing it.

Q. Would that have any effect on the percent by weight reported in this report or that would just be limited to the --

A. No. It wouldn't have an effect on that 'cause that's, basically, a visual estimate versus actually doing a calculation of the area, looking in, et cetera. So, it would have no effect on that.

Q. Okay.

A. What's the M number on that again? I'm going to make somebody fix that report.

Q. 71262.

A. 71262. Wrong area. PLM area. Okay.

Q. All right. Okay. I don't think I asked you this on day one, but is it still true that you have not performed a simulation study using any Johnson & Johnson container sourced from Vermont, correct?

A. That's still correct.

Q. And you have not performed any sort of simulation study using a Johnson & Johnson container sourced from Chinese talc, correct?

A. That is still correct.

CERTIFICATE OF OFFICER

I CERTIFY that the foregoing is a true and accurate transcript of the testimony and proceedings as reported stenographically by me at the time, place and on the date as hereinbefore set forth.

I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney or counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the action.

Andrea Nocks CCR CRR

ANDREA NOCKS, CCR, CRR

Certificate No. X100157300

Certificate No. XR00011300